

EXHIBIT 132



Deposition of:
Kurt Talbot

November 11, 2020

In the Matter of:
EIG v. Petrobras

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1 Leading your own witness. Form, foundation.

2 BY MR. GOLDMAN:

3 Q. Mr. Talbot did you, or, to your knowledge,
4 anyone at EIG know about the Sete corruption scheme as
5 set forth in Plaintiff's Exhibit 2 prior to the time
6 that the Sete Brasil corruption scheme was disclosed
7 publicly in the press?

8 MR. WOLINSKY: Objection. Improper redirect.
9 Lacks foundation. Form.

10 BY MR. GOLDMAN:

11 Q. You may answer.

12 MR. WOLINSKY: If you understand it.

13 THE WITNESS: No.

14 BY MR. GOLDMAN:

15 Q. Mr. Talbot, had you known about the Sete
16 corruption scheme, as set forth in Plaintiff's
17 Exhibit 2 back in 2011 before EIG approved its Sete
18 investment, what would you have done?

19 MR. WOLINSKY: Objection. Improper redirect.
20 Lacks foundation. Calls for speculation.

21 BY MR. GOLDMAN:

22 Q. Please answer, sir.

1 A. I would not support -- I would not knowingly
2 make an investment or support one where -- if we had
3 known corruption was rampant.

4 Q. Do you think, Mr. Talbot, that had EIG known
5 about the Sete corruption scheme, as set forth in
6 Plaintiff's Exhibit 2, that Sete investment would have
7 even reached the investment committee at EIG?

8 MR. WOLINSKY: Objection. Improper redirect.
9 Lacks foundation. Form. Calls for speculation.

10 BY MR. GOLDMAN:

11 Q. You may answer the question, sir.

12 A. I would be hopeful our processes would have
13 caught it, and no, it would have never made it to
14 committee.

15 Q. Now, I'd like you to turn back to Exhibit 21,
16 which was marked earlier in this deposition, if you
17 would.

18 A. Do you have a file size because names of
19 these exhibits aren't showing up for me. Just the
20 names aren't. 28. So it should be -- or a date.
21 November 11, '11. That's when I wrote it in here.

22 Q. It's 127 MB.

ERRATA SHEET*EIG v. Petrobras***Kurt Talbot November 11, 2020 Transcript (#4325418)**

<u>Page</u>	<u>Line</u>	<u>Change</u>	<u>Reason</u>
18	3	“roles” should be “role”	Transcription error
29	22	“when he was” should be “who was”	Clarification
33	21	“energy Funds” should be “Energy Funds”	Transcription error
45	3	“To the discussions” should be “Of the discussions”	Clarification
65	2	“Bolivia-to-brazil” should be “Bolivia-to-Brazil”	Transcription error
69	2	“So we had” should be “So he had”	Transcription error
73	20	“in investment committee” should be “from the investment committee”	Clarification
73	21	“was” should be “were”	Clarification
118	5	“all be a materiality” should be “all depend on materiality”	Clarification
145	8	“chief compliant officer” should be “chief compliance officer”	Transcription error
170	13	“make” should be “made”	Transcription error
193	22	“can” should be “can’t”	Transcription error
249	19	“LULA” should be “Lula”	Transcription error
266	7	“have passed through entity” should be “have a pass through entity”	Transcription error
269	8	“Curitiba of Pirana” should be “Curitiba-Paraná”	Transcription error
269	17-18	“Edward Luce” should be “Eduardo Musa”	Transcription error
270	1	“federal prosecutor’s” should be “Federal Prosecutor’s”	Transcription error

<u>Page</u>	<u>Line</u>	<u>Change</u>	<u>Reason</u>
270	2	“federal prosecutors” should be “Federal Prosecutors”	Transcription error
270	2	“issued an Event 471” should be “issued in Event 471”	Transcription error
272	10-11	“Curitiba of Pirana” should be “Curitiba-Paraná”	Transcription error
273	18	“Petroleo Brasileiro S.A. Petrobras” should be “Petroleo Brasileiro S.A. – Petrobras”	Transcription error
273	19	“above captioned” should be “above-captioned”	Transcription error
273	19-20	“assistant to the federal prosecutor’s office pursuant” should be “Assistant to the Federal Prosecutor’s Office, pursuant”	Transcription error
273	21-22	“Procedure with regard” should be “Procedure, and with regard”	Transcription error
273	22	“Event 471 hereby” should be “Event 471, hereby”	Transcription error
274	2	“federal prosecutor’s office” should be “Federal Prosecutor’s Office”	Transcription error
277	12	“bribe. As I normally” should be “bribe, as I normally”	Transcription error
278	3	“Federal Prosecutors” should be “Federal Prosecutor’s”	Transcription error
278	14	“Two thirds” should be “two thirds”	Transcription error
278	17	“responsible. That” should be “responsible, that”	Transcription error
279	11	“Federal Prosecutors” should be “Federal Prosecutor’s”	Transcription error
279	14	“born together because” should be “born together, because”	Transcription error
281	6	“that Sete investment” should be “that the Sete investment”	Transcription error

<u>Page</u>	<u>Line</u>	<u>Change</u>	<u>Reason</u>
282	16	"How far" should be "So far"	Transcription error

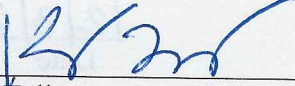



Kurt Talbot

12/3/2020
Date

ACKNOWLEDGEMENT OF DEPONENT

I, Kurt Talbot, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is a true, correct and complete transcript of the testimony given by me.


Kurt Talbot


12/3/2020
Date